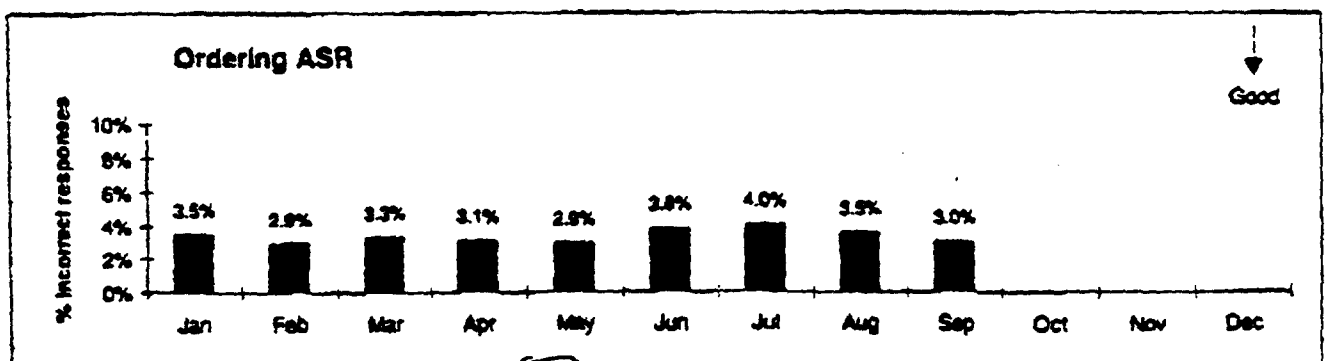
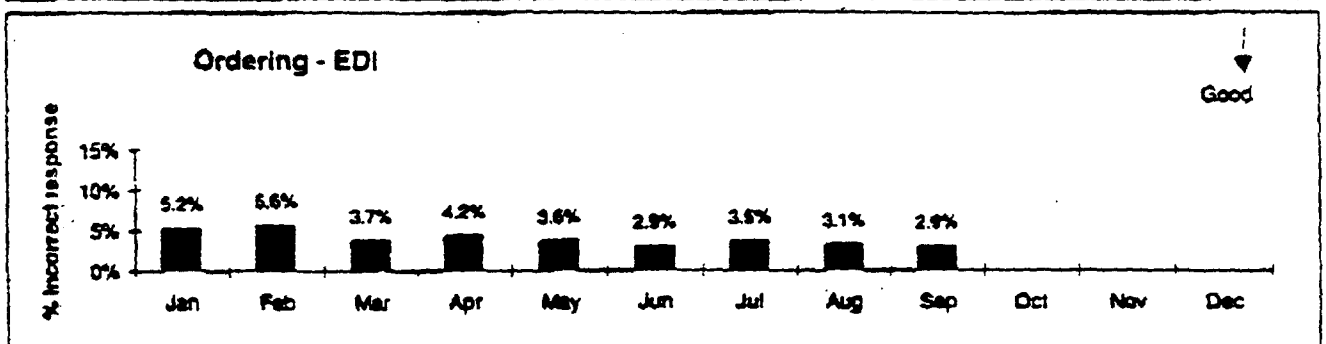
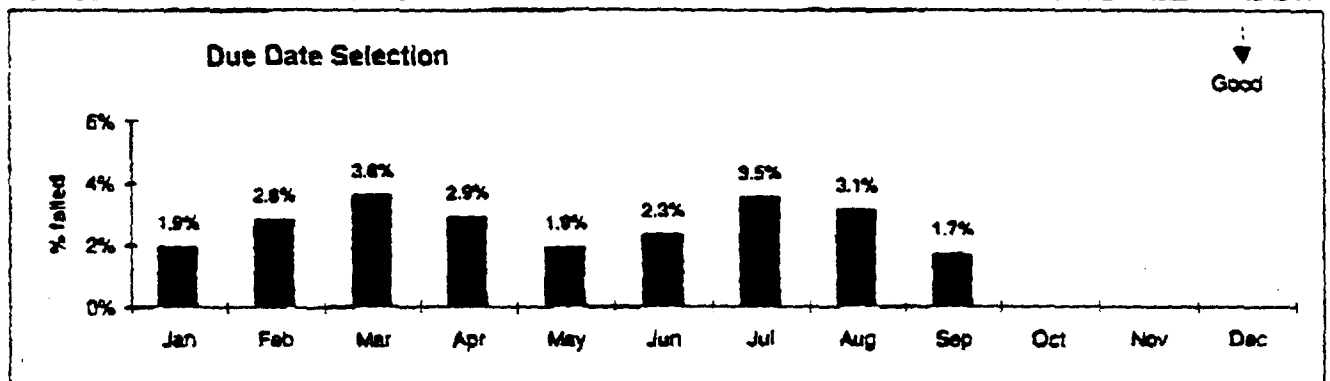
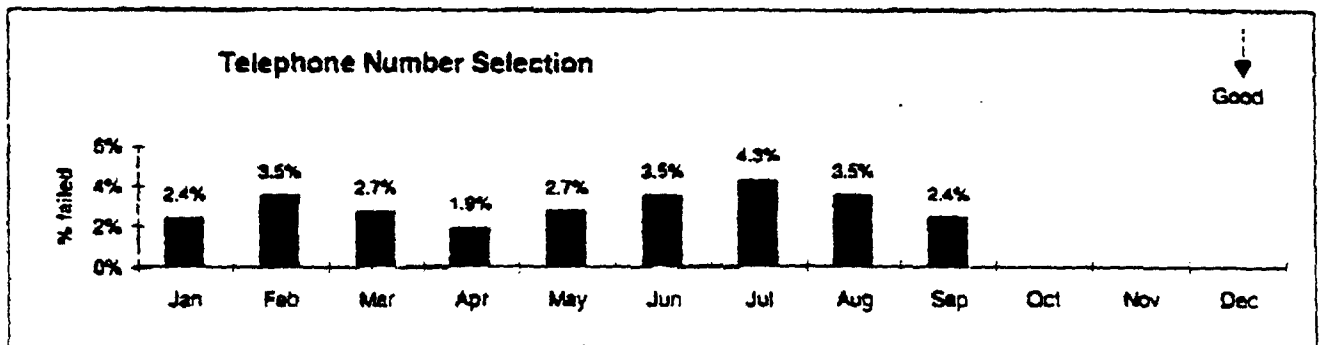
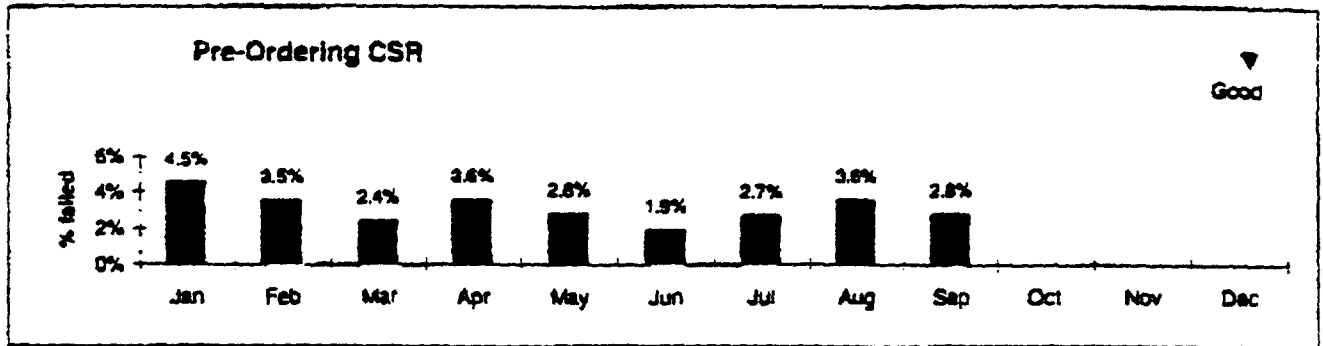
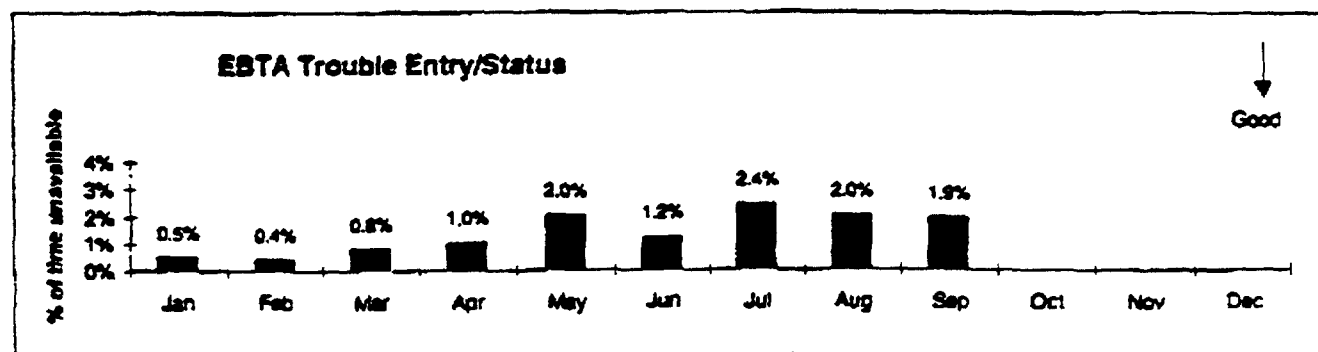
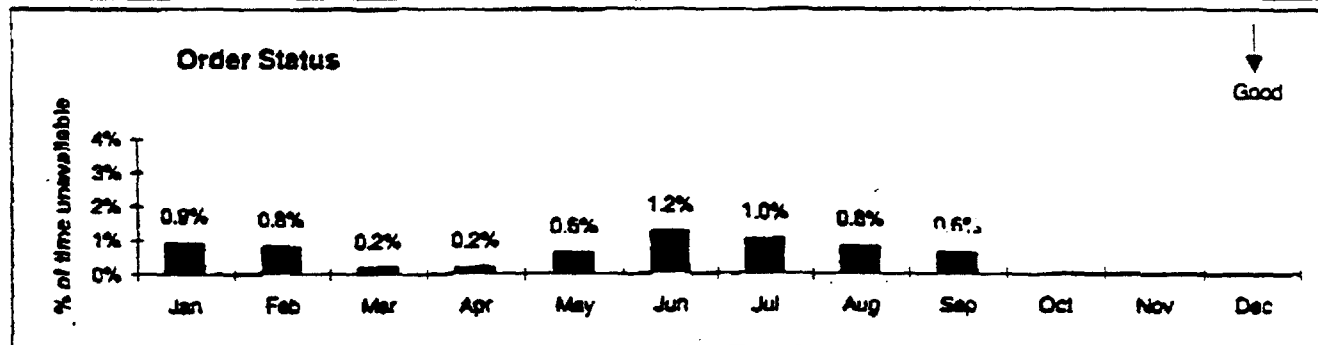
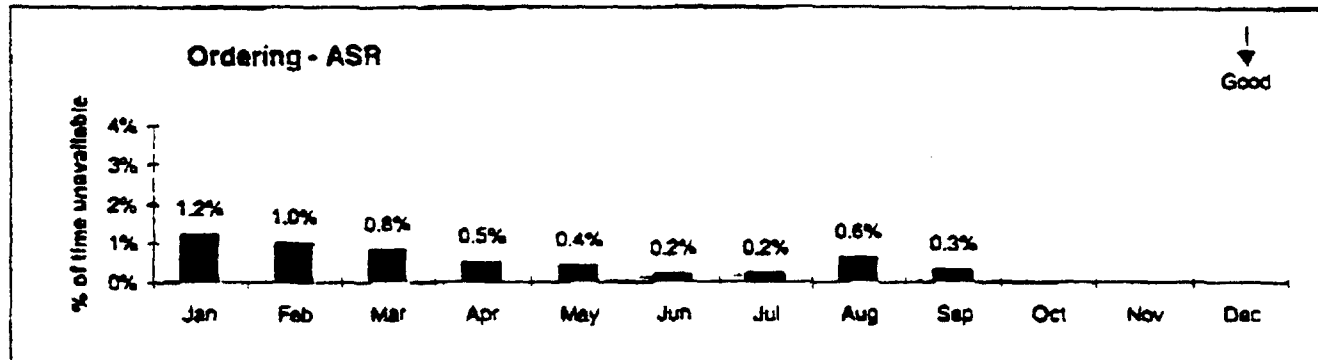
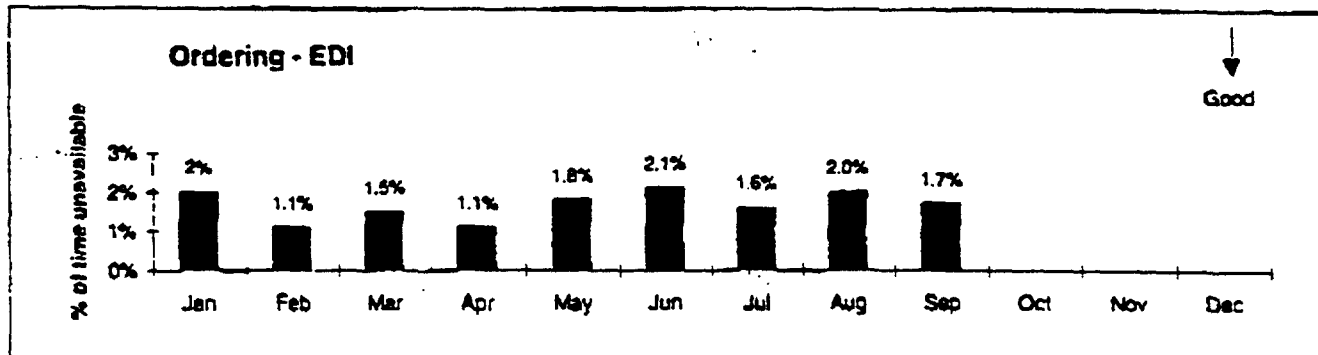
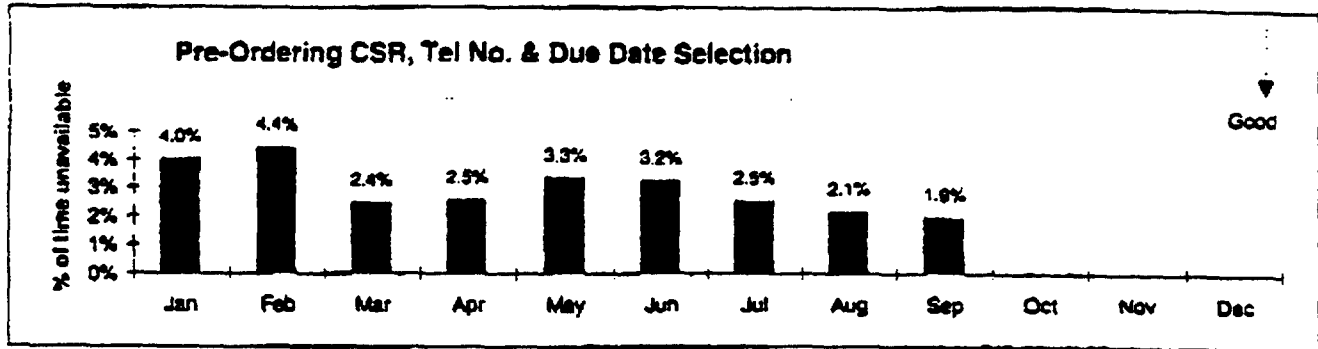


Company XYZ
OSS Platform Reliability for 1/1/96 to 9/30/96



Company XYZ
OSS Platform Availability for 1/1/96 to 9/30/96





Anne K. Bingham
Senior Vice President
President, Local
Telecommunications Division

March 17, 1997

HAND DELIVERED

The Honorable John McCain
Chairman
Committee on Commerce,
Science & Transportation
United States Senate
241 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator McCain,

This letter responds to the letter sent to you late today by Mr. Thomas Moulton, Jr. of Pacific Bell. See Ex. E hereto. Mr. Moulton, who it appears from his letterhead is resident here for the Washington Operations of Pacific Bell, appears to be either misinformed, or uninformed, about what is going on in California. Both the specific points and the entire thrust of his letter accordingly are simply wrong. Please allow me briefly to explain.

First, PacBell claims that I exaggerated in stating that "competition is on the fax room floor at PacBell." To the contrary, if anything, I overstated the facts in PacBell's favor. In fact, LCI's faxes often never even made it to the fax room floor, for two main reasons.

As our January 30, 1997 letter told PacBell, "often it takes six-plus attempts to fax to PacBell due to fax busy signals." See Exhibit A-5 hereto. Many of LCI's orders initially were delayed due to gross understaffing of the PacBell resale service center. Now, the delay is caused by poorly-trained staff.

Next, PacBell, unlike LCI's experience with other RBOCs, until today has flatly refused to train LCI's personnel in its 15 complicated order forms. This has caused an inordinate number of rejected orders. To even identify the problem in a rejected order can take weeks and lengthy escalations to a high level. This procedure, or lack thereof, stalls competitors and the development of competition and is simply unacceptable. See Ex. A hereto. Just today, PacBell finally committed to an initial training date of April 9, 1997 for LCI.

TAB N-1

Second, PacBell wrongly claims that LCI "is pleased" with the personal service PacBell is giving us. To the contrary, as PacBell well knows, we have registered our complaints about PacBell's many problems loud and long, both in writing and in an hour-long telephone call on February 26, 1997 between me and Liz Fetter and our respective staffs. See Ex. A hereto. In that high level escalation, which was LCI's attempt to obtain an answer to our eight previously unanswered letters, I personally complained to Ms. Fetter, who is the President of Industry Markets (the wholesale services 'arm of PacBell) about:

- PacBell's refusal to provide an EDI, ("electronic data interface"), a widely-accepted industry standard. At PacBell, EDI will not be available until, at the earliest, the third quarter of 1997. Instead, PacBell is offering a unique but temporary mechanized interface which will be obsolete within months. Even this system, according to AT&T at a press conference on February 12, 1997, can process no more than 450 orders a day. Understandably, LCI has chosen not to invest in the time and training for this temporary, but entirely inadequate system; and
- PacBell's refusal (or inability) to provide the daily usage information on a basis which would allow LCI simply to bill its customers. Despite Ms. Fetter's personal commitment to me to look into this issue, immediately, we have received no resolution in three weeks, and still are unable to bill our customers in California. This is an untenable situation obviously, and is due to the faults in PacBell's computer systems. See Ex. A, Bingaman letter to Fetter, 2/26/97.

It should be noted that all of the issues which have caused LCI such problems to date relate only to resale. On the critically important issue of unbundled network elements, we understand that PacBell does not yet have in place even manual procedures for ordering the most basic "Network Platform" combinations, let alone any computerized or mechanical procedures, or procedures for provisioning and billing. Mr. Moulton simply ignores these critical topics.

LCI is not alone in its problems in California. I have attached for your information, as Exs. B, C and D, formal complaints filed against PacBell before the California PUC filed by AT&T, MCI and Sprint in December 1996 and February 1997.

The Honorable John McCain
March 17, 1997
Page 3

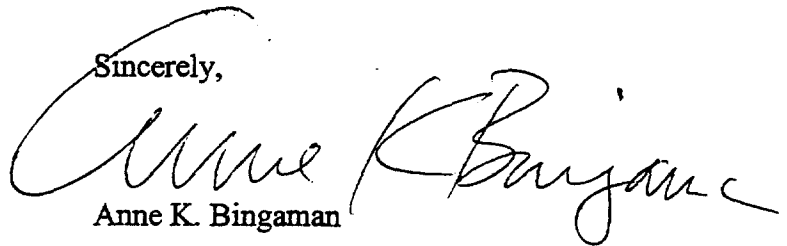
These official complaints highlight how other competitors have been stymied in their efforts to achieve parity from PacBell for their orders, and they totally belie the tone of injured innocence that pervades Mr. Moulton's letter.

Indeed, when the erroneous attacks on me and LCI are stripped from Mr. Moulton's letter, it is clear that PacBell remains a long way from achieving even minimal compliance with the fundamental requirements of the 1996 Telecommunications Act. As his three full paragraphs on page two make abundantly clear, PacBell is not even close.

As I told the members of the Senate Commerce Committee on Wednesday, March 12, LCI currently has hundreds of thousands of residential and business long distance customers in California. We would immediately offer bundled local service to all of those customers, if we had any confidence that PacBell could process those orders. But LCI cannot and will not put its California customers and customer base at risk until PacBell demonstrates that it can process orders for LCI and other competitors in the same numbers and at the same speed and service quality which it provides for itself.

LCI is working hard to compete in California, and we stand ready to help PacBell help us compete, so that our California customers will have a choice of local telephone service

Sincerely,



Anne K. Bingaman

attachments

AKB:slg

cc: Members of the Senate Committee on Commerce,
Science and Transportation
Reed Hundt, Chairman, FCC
FCC Commissioners Ness, Quello and Chong
Regina Keeney, Chief, Common Carrier Bureau, FCC
Richard Welch, Chief, Policy & Planning Division, FCC
Gail McGovern, A&T Corporation
Roy Neel, USTA
Thomas O. Moulton, Jr., Pacific Telesis Group, Washington



February 26, 1997

Ms. Liz Fetter
President Industry Markets
Pacific Bell
370 Third Street, Room 714
San Francisco, CA 94107

Dear Ms. Fetter,

Attached are the letters of issues and requests made of Pacific Bell, to date. Resolution of the following issues are essential if LCI International is to achieve parity with Pacific Bell.

Ordering

- Pacific Bell requires the use of 15 separate Order forms. Unlike the other RBOC's, Pacific Bell does not provide training. LCI has requested, and been denied, training for Order Form completion and CSR definition. Due to the lack of training, LCI is receiving a number of "rejects" on orders sent to the LISC. These rejects cause orders to be further delayed. *(see attached letter dated 2/14/97)*
- LCI has repeatedly requested an EDI interface. Pacific Bell is responding with a time frame of 3Q97, at the earliest. This timeframe is unacceptable. Other RBOC's are either using EDI or are much further along in the development process. *(see attached letter dated 2/14/97)*

Provisioning

- LCI continues to receive inadequate response time for Order Confirmations and Completion Notifications. The Pacific Bell CLC Handbook assures a 4 hour turn around for Order Confirmations, although LCI has agreed to an interim turn around time of 24 hours. LCI is receiving Order Confirmations as much as 7 days after the Order submission. LCI has never received a Completion Notification. *(see attached letters dated 1/23/97, 1/24/97, 1/29/97, 1/30/97)*

Billing

- Unlike other RBOC's, which have given complete USOC listings, Pacific Bell has simply referred LCI to the tariff to obtain USOC codes. Not all USOC's can be found in the tariff. LCI requires these codes for the accurate provisioning of customers and to create internal billing codes that can be tied back to Pacific Bell's codes for auditing purposes. *(see attached letter dated 2/4/97)*
- LCI is not receiving terminating numbers for half of the local usage detail. This information is essential to LCI for billing end users since we provide local usage detail. *(see attached letter dated 2/19/97)*

TAB N-4



- LCI is not receiving daily usage due to: (1) Two tables in the CABS (Carrier Access Billing System) require table updates. (2) LCI's Service Orders are not posting, causing the traffic to be held in a 'suspended' status. LCI bills at month end and will be unable to bill end users in February if this issue is not resolved immediately. *(see attached letter dated 2/19/97)*

Maintenance

- LCI is requesting Pacific Bell to support LCI end users for maintenance inside the point of demarcation. *(see attached letter dated 2/20/97)*

Voicemail

- LCI is at a competitive disadvantage if we cannot offer voicemail on a resale basis.

It is impossible for LCI to compete with Pacific Bell without the immediate resolution of these problems. We cannot support customers in a resale environment without the ability to Provision orders in a timely manner, Bill end users and provide Local customer maintenance.

Sincerely,

Anne K. Bingaman
President
Local Telecommunications Division

cc John Doolittle

Enc: Seven letters from Kirsten Johnson of LCI to Joe SantaMaria of Pacific Bell, dated 1/23/97, 1/24/97, 1/29/97, 2/4/97, 2/14/97, 2/19/97, 2/20/97 ; One letter from Kirsten Johnson of LCI to Don Griffin of Pacific Bell, dated 1/30/97.

TAB N-5



February 20, 1997

Joe SantaMaria
Resale Market Consultant
Pacific Bell
370 Third Street
San Francisco, CA 94107

Joe,

Per our discussion today, it was clarified that once an end user is assumed as an LCI customer, Pacific Bell will refuse all future maintenance beyond the point of demarcation. I ask that this policy be clarified to me in writing.

Other Regional Bell Operating Companies allow for maintenance to occur if the CLC contacts the RBOC directly. This gives that RBOC the assurance of CLC approval. I am requesting for this same policy to be granted from Pacific Bell.

Please call me with any questions regarding this matter.

Sincerely,

Kirsten Johnson
Local Project Manager

cc Anne Bingaman
Mike Wajsgras
Greg Casey
Wayne Charity

TAB N-6

LCI International[®]
Worldwide Telecommunications

February 19, 1997

Joe SantaMaria
Resale Market Consultant
Pacific Bell
370 Third Street
San Francisco, CA 94107

Joe,

This letter is document several problems that are occurring with LCI's daily usage. In addition, LCI requests that all daily usage contain Full Detail Recording.

Full Detail Recording

LCI is now being informed that we will not receive terminating numbers for all Local (zone 1 & 2) usage. Message types 10 01 01 will always provide Full Detail Recording unless General Assistance is indicated. However, message types 10 01 31 come from end offices that do not capture terminating numbers. All 10 01 31 traffic is zone 1 or zone 2 (no toll). About half of all Pacific Bell offices produce 10 01 31 messages.

Since LCI does not flat rate for Local and provides Local usage detail to all customers, this situation is unacceptable. We are requesting that Full Detail Recording be provided from all Pacific Bell end offices. With the entrance of Unbundled Service, this request may already be pending. Please provide an expected date to LCI immediately.

Daily Usage Issues

Per Gail Gentile, three outstanding issues are causing LCI to not receive daily usage. If these issues are not corrected prior to month end, LCI will be unable to bill customers for February.

1. One of the CABS files is not recognizing LCI's OCN of 7560. This requires a table update and per Gail, should be corrected prior to 2/21.
2. LCI's class of service is not being identified in CABS. This requires a table update and per Gail, should be corrected prior to 2/21.
3. There is a Service Order problem. Service Orders do not seem to be posting. A Suspend process is set up to "route" reseller traffic to CABS. This process holds the traffic until the Service Order posts. LCI's traffic is currently in suspend and therefore, not being routed. Per Gail, she hopes this issue is resolved by 2/21 but she did not seem confident as to what was causing the problem.

Resolution to these issues will be essential if LCI International is to maintain parity with Pacific Bell in Billing and Provisioning capabilities. Please let me know Pacific Bell's response to these issues as soon as possible.

Sincerely,

Kirsten Johnson
Local Project Manager

cc Anne Bingaman
Mike Wajsgas
Greg Casey
Wayne Charity

TAB N-7



February 14, 1997

Joe SantaMaria
Resale Market Consultant
Pacific Bell
370 Third Street
San Francisco, CA 94107

Joe,

This letter is to document some requests I have made over the last few days.

LCI is requesting training for both Order Form completion and CSR definition. The number of rejects we are receiving on orders submitted to LISC is largely due to the lack of training on the completion of these order forms. In addition, the CSR fields need to be defined clearly for LCI. The fields seem to be jumbled throughout the CSR and we remain confused about the inconsistency of the 'summary pages'. We are requesting CSR training, but documentation of "how to read a Pacific Bell CSR" is requested in the interim.

LCI also continues to request an order interface using EDI. It is my understanding from you that EDI will be available 3Q97 with an ordering interface only. You have also explained that some other resellers are sending orders via RMI (Resale Mechanized Interface). RMI would require LCI to make internal programming changes. You have provided me with documentation and a conference call is scheduled for 2/20 to discuss this option in detail. Please note, that regardless of the availability of RMI, LCI is requesting for an EDI interface prior to 3Q97.

Resolution to these requests will be essential if LCI International is to maintain parity with Pacific Bell in Billing and Provisioning capabilities. Please let me know Pacific Bell's response to these requests.

Sincerely,

Kirsten Johnson
Local Project Manager

cc Mike Wajsgas
Greg Casey

TAB N-8



February 4, 1997

Joe SantaMaria
Resale Market Consultant
Pacific Bell
370 Third Street
San Francisco, CA 94107

Joe,

This letter is to re-address the issue of USOC code availability. On 12/4/96 I had requested for Debra Koosed to supply LCI with a list of resale USOC codes, preferably in an electronic format. Debra responded that Pacific Bell does not supply USOC codes in any format and that a listing does not exist. I was referenced to the tariff to obtain an initial listing and any USOC updates. Unfortunately, not all USOC codes exist in the tariff. As you are aware, you personally offered to research some codes I was unable to find and had no success using the tariff.

Since Pacific Bell uses these codes to internally bill customers, it is not possible for the codes to "not exist". LCI finds it necessary to use USOC's for both 1) the accurate provisioning of customers and 2) to create internal billing codes that can be tied back to Pacific Bell's billing codes for auditing purposes.

LCI does not feel that requesting USOC lists is an unreasonable request. We are currently receiving these lists from other Regional Bell Operating Companies via electronic files, hard copy listings, USOC inquiry 800 number lines and files posted on the internet for all resale CLC's. These companies agree that it would be in their own best interest for LCI to have access to an accurate listing.

Resolution to this issue will be essential if LCI International is to maintain parity with Pacific Bell in Billing and Auditing capabilities. Please let me know Pacific Bell's response to this issue.

Sincerely,

Kirsten Johnson
Local Project Manager

cc Mike Wajsgras
Greg Casey

TAB N-9



January 30, 1997

Don Griffin
LISC Director
Pacific Bell
370 Third Street
San Francisco, CA 94107

Don,

The attached outline is to confirm our discussion on 1/30/97 regarding the resolution of several LISC issues that are keeping LCI from turning up and servicing customers in a timely manner in a resale environment.

Please contact me if you do not agree with any of the attached statements.

Sincerely,

Kirsten Johnson
Local Project Manager

cc Joe SantaMaria
Beth Rausch
Mike Wajsgas
Greg Casey

TAB N-10

LCI International
Worldwide Telecommunications

- CSR turnaround times

PacBell documentation assures 24 turnaround. LCI is experiencing 7 day turn around times.

Local sales are in jeopardy of being lost.

- Order Confirmation turn around times

PacBell documentation assures 4 hour turnaround, however LCI has verbally agreed to a 24 hour turnaround on a short term basis. Orders have been submitted for over 8 days and no Confirmations have been received.

Have received Confirmations with wrong customer names, phone numbers, account numbers, etc. Possibly receiving other companies Confirmations.

- LISC Fax and Call in numbers

Often it takes 6+ attempts to fax CSR's and Order's to PacBell due to fax busy signals.

The LISC 800 number has had hold times of 45+ minutes. On 1/22 the number was busy for 8 hours straight.

When LCI contacts the LISC regarding orders, they cannot be located, even when the correct PON is given.

The LISC does not recognize LCI as a reseller even when reseller ID is given.

Per the LISC, LCI's Point of Contact for Orders is listed as working for another company.

- Escalations

After receiving no Confirmation for LCI's first order it was escalated to 5 different people via 14 pages and voicemails. The matter has not yet been resolved, 6 days later. (Don Griffin, Anne Long, Victoria Flood, Joe SantaMaria, Linda Goolsby)

TAB N-11



January 29, 1997

Joe SantaMaria
Resale Market Consultant
Pacific Bell
370 Third Street
San Francisco, CA 94107

Joe,

I am including several of the major provisioning points that are keeping LCI from turning up and servicing customers.

Please contact me if you have any questions or resolutions regarding these issues.

Sincerely,

Kirsten Johnson
Local Project Manager

cc Anne Bingaman
Mike Wajsgas

TAB N-12

LCI International
Worldwide Telecommunications

- CSR turnaround times

PacBell documentation assures 24 turnaround. LCI is experiencing 7 day turn around times.

Local sales are in jeopardy of being lost.

- Order Confirmation turn around times

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Have received Confirmations with wrong customer names, phone numbers, account numbers, etc. Possibly receiving other companies Confirmations.

- LISC Fax and Call in numbers

Often it takes 6+ attempts to fax CSR's and Order's to PacBell due to fax busy signals.

The LISC 800 number has had hold times of 45+ minutes. On 1/22 the number was busy for 8 hours straight.

When LCI contacts the LISC regarding orders, they cannot be located, even when the correct PON is given.

The LISC does not recognize LCI as a reseller even when reseller ID is given.

Per the LISC, LCI's Point of Contact for Orders is listed as working for another company.

- Escalations

After receiving no Confirmation for LCI's first order it was escalated to 5 different people via 14 pages and voicemails. The matter has not yet been resolved, 6 days later. (Don Griffin, Anne Long, Victoria Flood, Joe SantaMaria, Linda Goolsby)

TAB N-13



Provisioning Escalation Correspondence Summary:

Date	Time	Correspondence	Outcome
1/23	1:00 pm	Vmail to Joe SantaMaria of 40 CSR's and 1 Order outstanding.	Joe on vacation.
1/23	2:00 pm	Vmail to Debra Koosed of same LISC issues.	Debra returned call, referred me to Don Griffin, LISC Director.
1/23	2:30 pm	Vmail to Don Griffin regarding same LISC issues.	Don referred me to Anne Long, LISC Sr. Manager.
1/23	3:30 pm	Vmail to Anne Long	Anne's vmail stated out of town and referred me to Victoria Flood, LISC manager.
1/23	3:40 pm	Vmail to Victoria Flood	no response to this vmail
1/23	4:00 pm	Spoke to Joe SantaMaria	Joe assured me I was using the proper escalation procedure.
1/23	4:30 pm	Letter to Joe SantaMaria	Faxed a letter to Joe, outlining the LISC issues
1/23	5:30 pm	Vmail and Page to Victoria Flood	no response
1/24	11:00 am	Vmail and Page to Victoria Flood	no response
1/24	12:10 pm	Vmail to Joe SantaMaria	
1/24	12:10 pm	Vmail to Anne Long	Anne returned call and stated that Victoria was handling issue.
1/24	12:20 pm	Vmail to Victoria Flood	Victoria returned call and stated that issue was referred to Grace Cuteris.
1/24	12:20 pm	Vmail to Linda Goolsby	Linda returned call, says not to be surprised if 6-8 lapse before CSR's and Confirmations are complete.
1/24	2:30 pm	Spoke to Grace Cuteris	Resolved outstanding CSR's. She assured me the Order would be complete by 1/25.
1/24	5:00 pm	Letter to Joe SantaMaria	Faxed letter to Joe requesting dedicated fax and 800 line and direct on-line access to CSR's.
1/27	10:00 am	Vmail to Grace Cuteris	no response
1/28	11:00 am	Spoke to Helen, in the LISC	Promised order would be worked and Confirmation return that day.
1/29	11:45 am	no order confirmation	

71111



January 24, 1997

Joe SantaMaria
Resale Market Consultant
Pacific Bell
370 Third Street
San Francisco, CA 94107

Joe,

The attached document is a summary of the discussion I had on 1/24/97 with Linda Goolsby. The summary contains a number of requests that are required by LCI to effectively provision and support customers in a resale environment.

Please call me if you need any clarification. I look forward to your response to these requests.

Sincerely,

Kirsten Johnson
Local Project Manager

cc Greg Casey
Mike Wajsgas

TAB N-15



The following is a summary of discussion items from 1/24/97 between Linda Goolsby (PacBell) and Kirsten Johnson (LCI).

LISC Requests:

1. Dedicated LISC Fax Machine

Requested for a LISC fax machine to be dedicated exclusively to LCI. Efforts to fax CSR requests and Orders have resulted in repeated busy signals. Numerous CSR requests have been faxed but never received. LCI cannot generate orders if CSR's are never received.

2. Dedicated LISC 800 Number

Requested for a LISC 800 number to dedicated exclusively to LCI. Attempted calls to the LISC have resulted in repeated busy signals and extremely long wait times. On 1/23 the number was busy during the entire business day. Due to the lack of an escalation process, this did not allow LCI to inquire on any of the outstanding CSR and Order requests.

3. Direct Access to CRIS

Requested for direct on-line access to obtain CSR's via CRIS. This access has been granted by other Bell Operating companies and allows for on-line CSR requests to be turned around in minutes.

Escalation Requests:

LCI has requested the name(s) of the top level Management and General Counsel at Pacific Bell. Linda gave the following:

Liz Fetter, Industry Markets Group President
370 3rd St, Room 714
San Francisco, CA 94107

Dave Doorman, Pacific Bell President
130 Kearny St, Room 3700
San Francisco, CA 94108

No General Counsel information was provided. Linda explained that this information could be issued only with a specific issue cited. An LISC issues should be taken up with:

Don Griffin, LISC Director (415) 542-0209
Don reports to Jon Stankey.

TAB N-16



January 23, 1997

Joe SantaMaria
Resale Market Consultant
Pacific Bell
370 Third Street
San Francisco, CA 94107

Joe,

This letter serves to document the issue of CSR and Order Provisioning timeliness. The CLC handbook assures a 24 hour turn around for CSR's and a 4 hour turn around for Confirmations. Due to order volume in the LISC, you had verbally informed LCI of a 24 hour turn around for Confirmations. This turn around time is acceptable in the short term until the LISC is properly staffed to meet the documented intervals. However, **LCI expects all CSR and Order Confirmations to be returned within 24 hours of the request being submitted.**

LCI's first order was sent to Pacific Bell's LISC fax number, documented in the CLC handbook, on 1/20/97. After a full day had lapsed, LCI contacted the LISC and found that we had been given the wrong fax number. The order was re-faxed on 1/21/97 at 12:00 pm(EST). It has now been 46 hours since the order was sent and no Confirmation has been received. Attempts to call the LISC have resulted in busy signals all day on 1/22/97. Pacific Bell has failed to provide LCI with an "Escalation Process" despite repeated requests. PON #011797 has since been escalated to Don Griffin, Director LISC. Don has assigned the issue to Anne Long, Manager LISC. No resolution has been achieved as of yet.

LCI has submitted 40 CSR requests that have not been turned around within 24 hours. Please find the attached list of requested CSR's that have still not been resolved. In addition, we constantly experience busy signals from the LISC fax machine when CSR requests are faxed.

Please call me if any clarification is needed regarding this issue.

Sincerely,

Kirsten Johnson
Local Project Manager

cc Greg Casey
Mike Wajsgras

TAB N-17



CSR Requests - No Response

Date Submitted

1/17/97

Customer Name

Becker Precise Machining
Softland Security
The Tepper Group
Tom logon
Fidelity Information Corp.
Quick Silver
Jewelry Design Artisans
Online Connecting Point
ID6

1/21/97

Marcole Enterprises

Bruce Abbott

1/22/97

MONISERV, Inc.

Talhase Company, Inc.

State Wide Insurance

ABC Pediatrics

Big Joe California

Visual Concepts

Westend Art

Frank Schmidt

Wolfcrest Entertainment

Security Financial

Noewe & Associates

Environmental Equipment Consulting

Insurance Advisors

Practical Sales Solutions - Hunt. Beach

Practical Sales Solutions - Inglewood

Practical Sales Solutions - Irvine

La Tapatia

R.W. James Packaging

Technolinc Corp.

Dave Petzold

Strategic Financial Services

NFC Financial

ZI

Northridge

Belvedere Associates

Thunder Max Corporation

Global Mortgage Company

Axin Financial

Harvey Universal

TAB N-18

Richard Scheer
Law & Government Affairs
1996 Accomplishments

Participated in numerous negotiation sessions with incumbent LECs in support of AT&T's efforts to reach interconnection agreements. Negotiation efforts continued through arbitrations and following release of Arbitrator's Reports. Efforts recognized by Local Services V.P. (L Hedg-peth).

Served as integral member of legal team in AT&T-GTE and AT&T-PB arbitrations, by developing INP sections of opening and closing briefs and contract language, often working extended hours under tight deadlines. Strong support was acknowledged by regional and HQ attorneys.

Developed arbitration testimony in support of INP methods, explaining regulatory requirements and technical feasibility. Delivered testimony in hearings in articulate, credible manner. Strong case was evident in results: Arbitrator's Reports resolved virtually every INP issue in AT&T's favor.

Wrote INP sections of Coalition and AT&T filings before CPUC which explained effect of FCC Number Portability order on PB and GTE tariffed remote call forwarding (RCF) INP. Worked effectively with other Coalition members to craft arguments for additional INP methods and competitively neutral cost recovery.

Provided continual feedback to other regions and HQ on INP developments, allowing other regions to leverage off success and recognize potential pitfalls.

Developed response to GTE Hawaii INP tariff, used virtually verbatim by outside counsel in AT&T protest of tariff. Protest pointed out numerous shortcomings in GTE tariff, e.g., not competitively neutral, insufficient under TA96, FCC and Hawaii rules.

NXX Code Opening Costs

Strongly advocated against PB efforts to charge as much as \$30K per NXX code assigned to competitive local carriers (CLCs). Met with CPUC staff (D. Duda, K. Jones) to explain effect of FCC 96-98 Second Interconnection Order. Worked closely with other Coalition members to develop arguments against PB position. Arguments were persuasive: CPUC denied PB request to charge for NXX code openings.

Worked closely with HQ to develop AT&T Petition for Reconsideration of FCC 96-98 Second Order. Performed primary research on behalf of HQ Law & Public Policy, by examining testimony, tariffs, customer contracts, FCC filings, and experience of AT&T Local and AT&T Wireless representatives. Material was used to shape AT&T arguments for clarification of FCC 96-98 Second Order re "bright line" distinction between NXX code opening charges and recovery of costs for number administration.

CLC NXX Rate Center Consistency

Participated in CPUC workshops to implement CPUC decision allowing CLCs to use NXX codes over more than one incumbent LEC rate center. Represented AT&T as chief technical expert and regulatory advocate for AT&T NXX-X Assignment proposal at CA Rate Center Task Force. Wrote AT&T's Contribution on NXX-X Assignment, which was submitted to Industry Carriers Compatibility Forum (ICCF) NXX Rating/Routing workshop by Bob Hirsch, AT&T Labs. ICCF Contribution was praised for clarity and objectivity by several Industry SMEs. Worked closely with HQ Law & Public Policy, AT&T Labs, NSD, rating/billing SMEs, others to apprise them of CA Rate Center Task Force activity and develop strategy for ICCF workshop, in view of lack of industry consensus on single technical solution. Worked with same

TAB N-19

Richard Scheer
Law & Government Affairs
1996 Accomplishments

groups to develop AT&T's FCC comments and replies on Teleport Communications Group (TCG) Petition for Declaratory Ruling, in which TCG had called for adoption of its "Number Crunch" proposal.

Numbering and Dialing

Supported Public Relations' (K. Oram) requests for information and interview with press (San Jose Mercury News) to explain AT&T positions on LNP, 10 digit dialing, neutral numbering administration, and NPA relief plans.

Performed research and provided documentation on California, Illinois and Missouri NPA relief orders to HQ Law & Public Policy in developing AT&T's FCC comments on Massachusetts PUC Petition which sought FCC guidance on allowing wireless customers to retain numbers in a geographic NPA split.

Prepared responses to Consumer Advocate's questions on numbering administration, NPA relief, Local Exchange Routing Guide (LERG) Reassignment of NXX codes and LNP reciprocity, for AT&T-GTE Hawaii Arbitration case (96-0329).

Interconnection Agreements

Developed AT&T's comments on TCG-PB and Cox-PB interconnection agreements under ALJ 167 rules. Evaluated agreements against TA96 Section 271 checklist in support of federal advocacy efforts. Worked closely with outside counsel (J. Wadsworth of McCutchen) to develop AT&T comments on several PB agreements with CLCs under criteria established in Managing Commissioner's Ruling (MCR).

Personal Development

Improved upon leadership and management skills through participation in corporate *Insight I* program.

Participated in conflict resolution training, in support of personal effectiveness and L&GA diversity goals.

Expanded knowledge of PC software, including familiarity with MS Exchange, Windows NT, Netscape.

Team support

Participated in planning meetings, prehearing conferences, meet-and-confer sessions, and discovery negotiations in Pacific Bell Communications CPCN Application and SBC-Pacific Telesis Merger cases, prior to hiring of dedicated case manager (A. Gaines) for those cases.

Supported other associates' information needs, e.g., S. Huels, G. Rall and B. Tierney (descriptions of LRN and INP methods); J. Gil (LNP status); T. Ono (status of Rate Center and DID Workshops); L. Strovink (BOC accounting and nonaccounting safeguards rulemakings and BOC out-of-region nondominant status); M. Alexander of Lucent Technologies (docket manager responsibilities and Federal Register website materials); J. Lakritz of CPUC (FCC 96-128 payphone NPRM).

Established rapport with team members through planning of L&GA summer event at Great America, and supported AT&T hospitality suite at NARUC conference.

TAB N-20